

October 23, 2019

Ex Parte

Marlene Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295; Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz, GN Docket No. 17-183

Dear Ms. Dortch:

On October 21, I participated in a panel discussion with FCC Commissioner Michael O'Rielly at the EnVision Forum in Lexington, Kentucky, hosted by the Federal Energy Regulatory Commission (FERC) and the University of Kentucky, during which we discussed the 6 GHz proceeding.

In my presentation I stated that the Commission should adopt rules to authorize three device classes in the 6 GHz band: standard-power access points (APs) under the control of an Automated Frequency Coordination (AFC) system, low-power indoor only APs, and very-low-power portable devices (operating at power limits 160 times lower than standard Wi-Fi). I also stated that the Commission's proposal to open the full band to unlicensed technologies will allow licensees to continue their services uninterrupted, whereas proposals to clear and license portions of the band would displace incumbents, disrupt their operations, and delay consumer access to band.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above referenced dockets. If you require any additional information, please contact the undersigned.

Sincerely,

Paul Margie

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Counsel to Apple Inc., Broadcom Inc., Cisco Systems, Inc., Facebook, Inc., Google LLC, Hewlett Packard Enterprise, and Microsoft Corporation